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7 Attorney for Jaime Adalberto Espinosa-Ramos

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JAIME ADALBERTO ESPINOSA-RAMOS,

15 Defendant.

Case No. 2:24-mj-00306-BNW

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi A.
20 Ojeda, Assistant Federal Public Defender, counsel for Jaime Adalberto Espinosa-Ramos, that
21 the Preliminary Hearing currently scheduled on April 5, 2024, be vacated and continued to a
22 date and time convenient to the Court, but no sooner than three (3) days.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel needs additional time to discuss waiver of the preliminary
25 hearing with her client.
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2. Defendant is incarcerated and does not object to a continuance.

3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the first request for continuance filed herein.

DATED this 4th day of April, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Heidi A. Ojeda

HEIDI A. OJEDA
Assistant Federal Public Defender

By /s/ Daniel J. Cowhig

DANIEL J. COWHIG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

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6 JAIME ADALBERTO ESPINOSA-RAMOS,

7 Defendant.
8

Case No. 2:24-mj-00306-BNW

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 April 5, 2024 at the hour of 1:00 p.m., be vacated and continued to April 16, 2024 at
13 the hour of 10 : 00 a.m.

14 DATED this 4 day of April, 2024.

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17 UNITED STATES MAGISTRATE JUDGE
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